Region 2 Division of Enforcement & Compliance Assistance
Air Compliance Branch

CAA Inspection Report

(Send to state/facility)

Inspection Date(s): July 17, 2018

Facility Name: Tallaboa Industrial Park

Facility Address: Road 385, Km. 5.4, Barrio Tallaboa Poniente, Penuelas, Puerto Rico 00624

Owner: Tallaboa Industrial Park

Operator: Homeca

ICIS-Air ID #: 3400066954

Federal Facility: ☐ Yes ☒ No

Facility size: N/A

Planned Activity: PCE

Priority: Core

State Referral: ☐ Yes ☒ No

NAICS code: 238910 - Demolition, building and structure

Misc. Data: …

Facility Contact: Benjamin Cintron, Homeca, Project Manager, benjmancintron.homeca@gmail.com

Ramos Eduardo, Homeca, General Manager, eramosvera@hotmail.com

Jose Dejesus, Tallaboa Industrial Park Manager

EPA Lead Inspector: Victor Tu, Environmental Engineer, 212-637-3476

EPA Asst. Inspector: N/A

State Inspector(s): N/A

Other Inspector(s): N/A

Permitted Regulatory Program(s) Evaluated:

- ☐ SIP 110
- ☐ NSPS 111 – Subparts: Click here to enter subparts.
- ☒ NESHAP 112 (61) – Subparts: M --Asbestos
- ☐ MACT 112 (63) – Subparts: Click here to enter subparts.
- ☐ CFC 608
- ☐ PSD (Part C)
- ☐ NSR (Part D)
- ☐ TV
- ☒ N/A

Major Pollutant(s): N/A
SM80 Pollutant(s): N/A
Misc. Data: Asbestos

Pertinent Regulatory Requirements

Asbestos NESHAP – 40 CFR 61 Subpart M

Summary of Observations

On July 17, 2018, EPA inspector, Victor Tu, arrived at the Tallaboa Industrial Park (TIP) site at approximately 10:00 AM. Prior to making entry, the EPA inspector ("inspector") drove around the road adjacent to the site. While driving on the road, the inspector noted that there is a local restaurant/bar south of the site that is open for business. Directly south of the fence line was a parking lot that appeared to be full at approximately 10:27 AM (See figure 1). Gas truck with the "Gulf" logo was seen coming into and out of this parking lot. The inspector also noted that located directly north of the TIP site, Empire Gas De Puerto Rico, a propane distributor, was open for business.

Figure 1, Parking lot directly south of the fence line of the Tallaboa Industrial Park Site.

At approximately 10:45 AM, EPA inspector entered the TIP site and presented his credential to the attendant at the gate. Initially, the inspector attempted to contact Samuel Quinones, the Environmental Consultant that represents TIP, but was not successful. The attendant was able to reach a Homeca representative that was on site. No TIP representative was on site at the time of entry. Inspector requested to speak with the TIP site representative at the time of entry. Mr. Cintron attempted to contact Mr. Quinones, and left a message with him.

Homeca representatives that were on site included:

Benjamin Cintron, Project Manager
Eduardo Ramos, General Manager
Marlin Cabrera, Site Engineer

Homeca representatives escorted the inspector to the office that was setup in the middle of the TIP site. (See figure 2) The road to the site was not paved nor was there any sign of wetting to reduce dust plumes from vehicle activities. Inspector saw trucks driving into the site when he was getting out of his car. It appears that every time the truck breaks, a 4-6 feet dust plume is generated. Mr. Ramos confirmed during the in-brief that there is no wetting of the roads into the site and the dust plume is a result of the activation of the air brakes on those trucks.

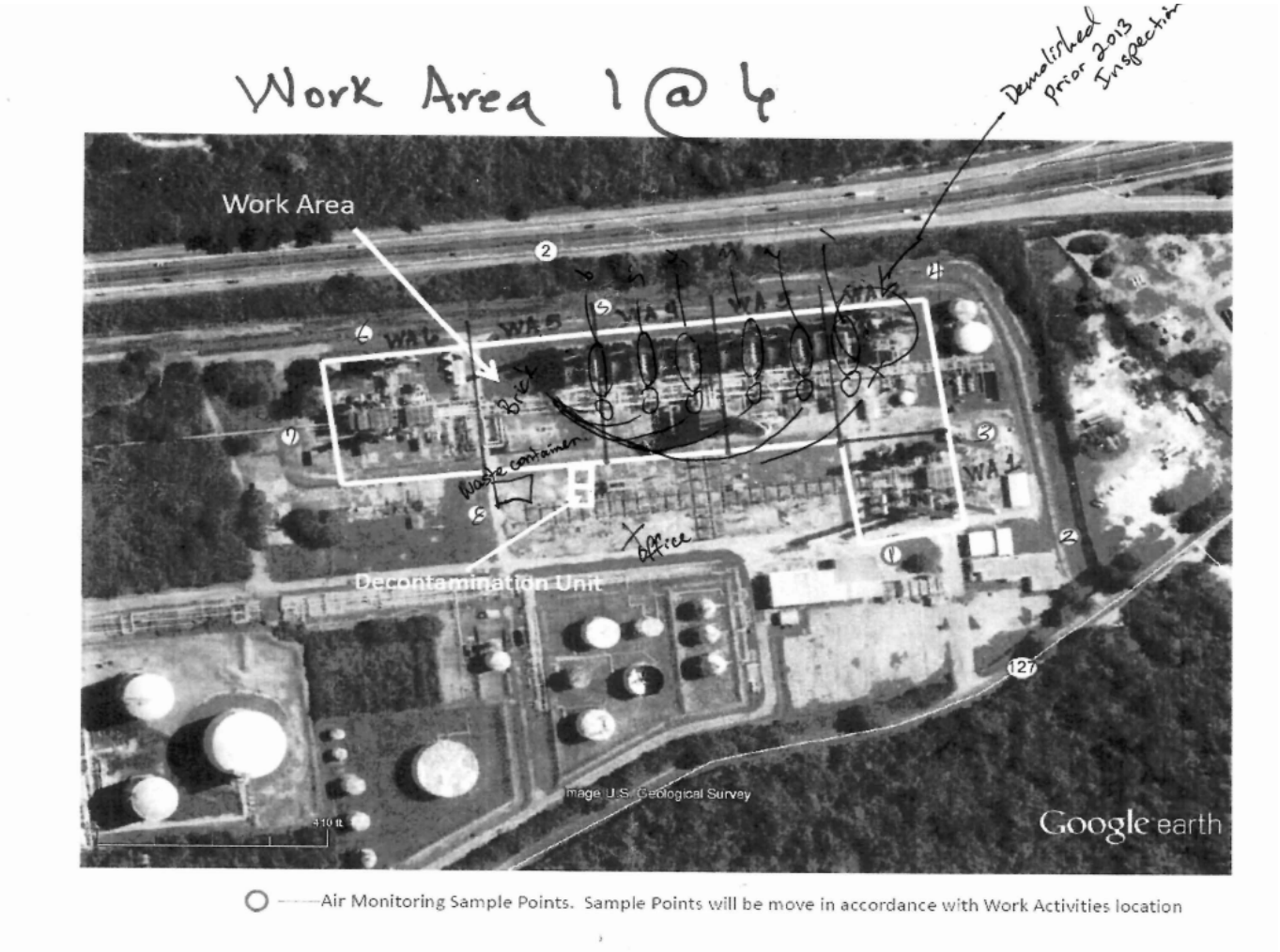

Figure 2, Site map with inspector's notes

During the in-brief with Homeca representatives, the inspector asked what the original work agreement entails between TIP and Homeca. Mr. Ramos stated that they were going to demolish the structures in the area designated by the workplan, which included the 6 boilers and 6 boiler stacks, the pipes that ran through the whole length of the work area designated by the workplan and all the structures still standing in the work area.

Mr. Ramos showed the inspector, on his cell phone, 3-D images of the work area before Homeca started demolition work at the site in 2013 (See figures 3 and 4). Mr. Cintron stated that the pipes, boilers, and boiler housing were removed by Homeca. Mr. Ramos stated that the removal was done in accordance with the all rules and regulations.

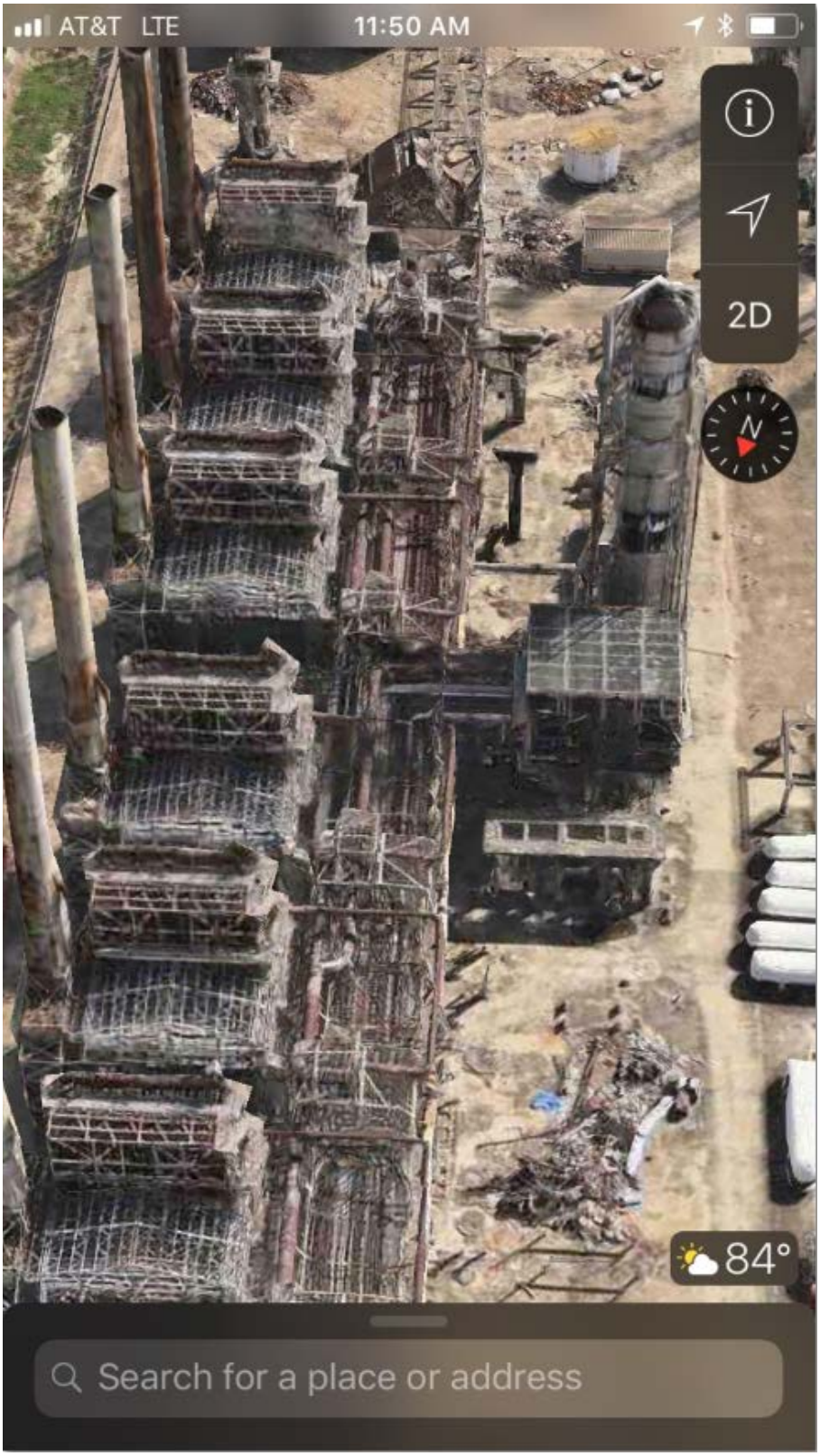

Figure 3, Image of TIP site prior to Homeca starting work in 2013

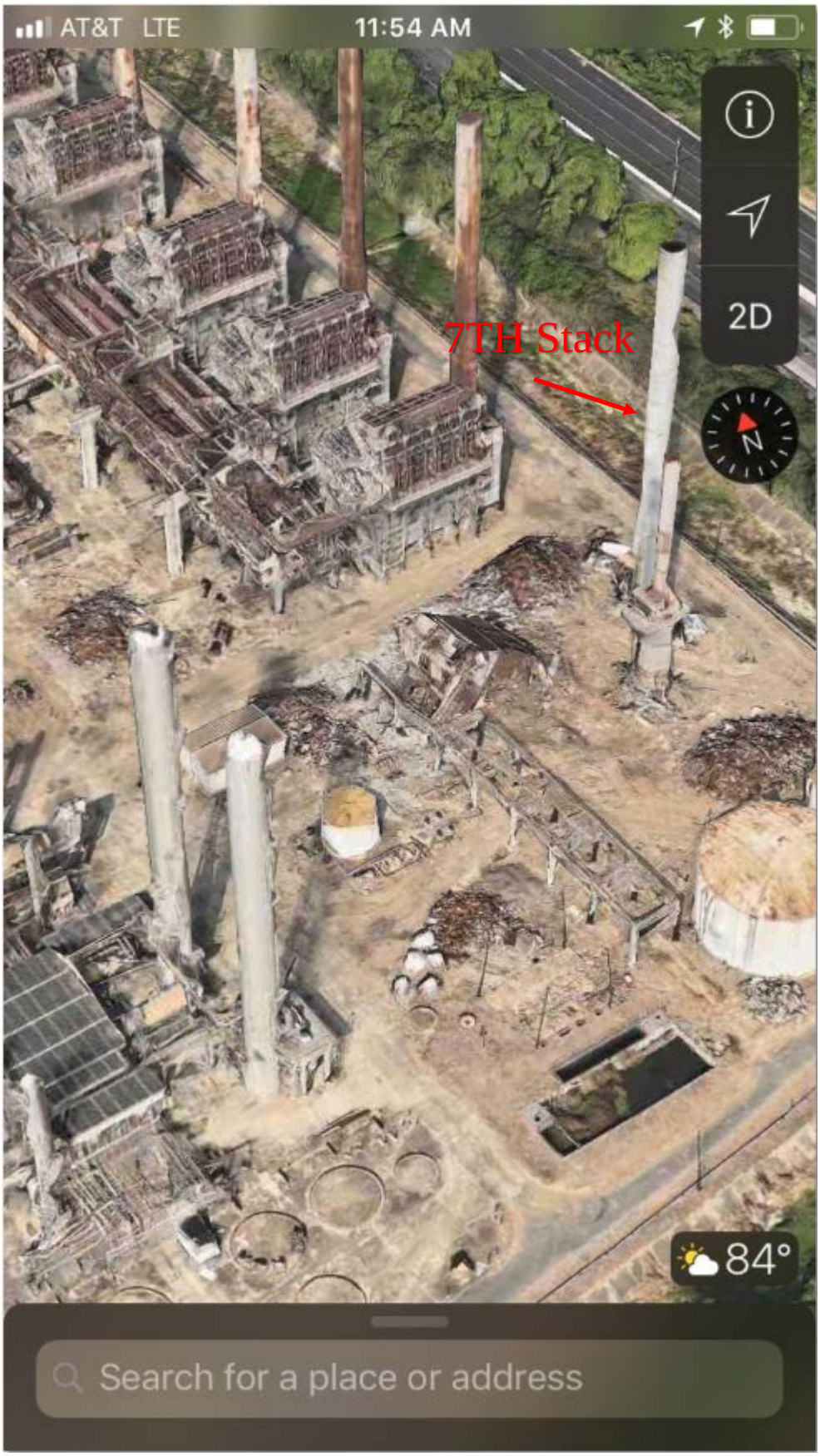

Figure 4, Image of TIP site prior to Homeca starting work in 2013 – Seventh smoke stack was still standing

The inspector requested to see documentations that related to the asbestos abatement and demolition project that Homeca had on file. Mr. Ramos stated that all documents have been submitted to Jose Font (EPA, Deputy Director of CEPD). He stated that Homeca disposed of approximately 3800 cubic yard of waste which he claimed Homeca provided to Mr. Font. Mr. Ramos agreed to send the inspector the waste manifest generated from the project. Copies of the manifests with some pictures taken by Homeca taken during the abatement work between 2011 and 2012 were received by the inspector on 7/27/2018. Because Homeca claimed the information provided was CBI, it will not be attached to this inspection report.

The inspector reviewed the following documents at the time of the inspection:

(1) EQB permit for work effective 3/28/2017 – 3/28/2019 – Permit # PE-ASB-57-03-17-0027
(2) EPA notification (Received by EPA on Feb 10, 2016)
(3) EPA amendment notification (Change start date to May 1, 2017)
(4) Notification to EQB that they will be starting work on April 17, 2017
(5) Training credential of supervisors

Homeca had four individuals listed as supervisors at the time of the inspection. These individuals are:

(1) Jorge E. Velazquez Irizarry – training expires May 24, 2019
(2) Melvin Feliciano Aponte – training expires May 17, 2019
(3) Norma J. Collaro Ramos – training expires June 18, 2018 – According to Mr. Ramos, individual departed Homeca approximately 6 months ago.
(4) Benjamin Cintron Pagan – training expires June 18, 2018 – According to Mr. Cintron, he has completed the training but has not received the new card.

At approximately 12:00 PM, EPA inspector requested that Mr. Cintron contact Samuel Quinones again to see if he would be available to talk to the EPA inspector. This time, Mr. Cintron was able to get through to Mr. Quinones. Mr. Quinones stated that he was not in the local area. He agreed to call someone from TIP to have him stop by.

Mr. Jose De Jesus, Manager of TIP stopped by. EPA inspector asked if there were any documentation that is available onsite pertaining this project. He stated that Homeca would have all the documentation and that they do not have any documents pertaining to this project on site. He recommended that the inspector contact Samuel Quinones if we need something that pertains to this project.

At approximately 12:20 PM, Inspector requested to see the setup for the air monitoring. Mr. Cintron brought the inspector to the trailer that was setup to analyze the filters from the air monitors. The inspector met Jose Santo, the lab technician, from Altol Environmental. He is assigned to setup the air monitoring and personal monitors. The microscope is setup in the trailer on-site which allows him to provide the results to Homeca the day after the air monitoring sample is taken (12 hour-turnaround). On the way back to Homeca's office, Mr. Cintron showed the inspector the personnel decontamination area and the vehicle cleaning area. A cement berm was established to contain water that is used to clean vehicles leaving the Homeca work area. The water is then pumped and filtered before going into the "two water buffalos" as seen in figure 5. At the time of the inspection, no air monitoring station was noted outside the personnel decontamination station.

Fig 5, Passage way into the Homeca site. A berm station was setup for vehicle cleaning. Two water buffalo is setup to collect filtered water collected from the vehicle cleaning. A decontamination station was also seen in the picture. Passage has been cleaned so that they can drive trucks into the site.

Melvin Feliciano, an asbestos supervisor with Homeca, was assigned to take the inspector around the site. At approximately 2:30 PM, the inspector and Mr. Melvin put on personal protective equipment and entered Homeca's Work area which is marked off by "red caution tape". The first thing that we looked at was the inside of the personnel decontamination station. The inspector entered via the "clean" area and walk towards to the "dirty" area. In the dirty area, the inspector noted that the bags used for collecting PPE was not properly labeled (see figure 6). The bag appears to be half full. Mr. Feliciano immediately requested that the bags be changed to the properly labeled bags vial his handheld radio. At the end of the walkthrough, the bags were replaced with properly labeled bags. During the whole time of the walkthrough, the inspector did not see any personnel working onsite.

The inspector walked into the site and turned right. Soon after making a right turn from the decontamination station, the inspector noted that pipes with insulation laying outside a locked shed (see figure 7). Mr. Feliciano stated that he did not know where these pipes came from. The material was not wrapped and not wet. There was no equipment (water sprays) that would maintain the material wet at all times. The inspector asked if he can get into the locked shed. Mr. Feliciano stated that Homeca does not have access to the locked shed.

Figure 6, Inside the decontamination station, an unlabeled bag that was used in the contaminated space for used personal protective clothing and filters.

Figure 7, Pipes with insulation that was found outside a locked shed. Homeca staff stated that they did not have access to the shed. Homeca staff also stated that they were not aware how the pipes with insulation got there. The material was not wrapped and not wet.

Figure 8, location where pipes with insulation was found as noted in figure 7.

The inspector continued heading south of the Homeca work site (See figure 9). Comparing photo provided by Mr. Ramos which shows the site before Homeca started work in 2011 (figure 3 and 4), to the picture taken

during this inspection (figure 10), it appears that Homeca also partially demolished the two columns seen in figure 10. On one of the two columns, insultation material was still on the remaining portion of the column (see figure 11). Nearby to this location, the EPA inspector observed cladding that that appears to have fallen from standing structures. Homeca has collected some of these metal scrap into a pile (see figure 12). Insulation blocks resembling the insulation that is still on the column at the time of the inspection (see figure 11) was found scattered throughout the worksite. An example of this is seen in figure 13. Figure 14 shows the deterioration of insulation material after being exposed to the elements. The inspector also saw white circular drops of white material scattered throughout this area. (see figure 13)

Figure 9, Southern most location of work area. (see fig 7)

Figure 10, Southern End of the work area. Columns and tanks that have relatively intact ACM and aluminum covers. Pipes still appears to have insulation on it. The abatement of the asbestos on these structures are part of

Phase two of the work plan. Comparing figure 3 with figure 10, it appears that the columns identified above were demolished by Homeca as part of this project.

Figure 11, Closeup of the columns in figure 10 where insulation was exposed to the element. Image shows that a large section of insulation and cladding is missing from the structure and deterioration of the exposed insulation.

Figure 12, Pile of comingled debris. Pipe with insulation, cladding, pipe wrapping and metal were among the material that were identifiable.

Figure 13, Insulation material which resembles insulation on the larger structures.

Figure 14, Insulation material that appears to have been exposed to the elements.

Figure 15, Pieces of deteriorated insulations dropping from standing structures result in white circular dots on the ground. This was seen all throughout the site.

Figure 16, Pipe insulation that appears friable and dried laying in the open.

Pipe insulation was found on the ground in this area (see figure 16). The material appears to be dry and a sample appears to have been taken by Superfund based on the marking. The ground in the area is so dry that cracks developed in the soil (see figure 17).

Figure 17, The imprint of a piece of insulation that was taken during CERCLA inspection a few days ago. The cracks in the ground is indicative of how dry the condition is at the site.

The inspector continued heading north-east (see figure 18). This is the location where, according to Homeca, a boiler was removed prior to Homeca taking the job. The stack was demolished by Homeca. The brick and non-metal debris remains on site and is located in close proximity to where it was removed from, near the corresponding stacks (see figure 19). The debris appears to be dry with no indication that there was any attempt made to keep it wet at all times, i.e. no water hose or water misters found. Figure 20 provides a better look of the liner inside the stack that Homeca did not test prior to demolishing the stacks.


Figure 18, Location where boiler was demolished prior to Homeca taking the job. The stack was not demolished prior Homeca taking the job (see fig 3).

Figure 19, Piles of brick and rubbles from the boiler enclosure demolition. The material was dry with no indication that it has been kept wet. The picture also shows that there is a layer of mortar like lining inside the metal stack.

Fig 20, Closeup of the stack opening, it is noted that a thick layer of mortar like lining is present. Part of the lining appears to be damaged and has fallen off.

Figure 21, Location where 6 boilers were demolished by Homeca as part of the original job.

Figure 22, What is left of the metal structure that used to house the boiler. There are six of these structures still standing. The stack appears to be cut in half. It appears that a mortar like lining covers the entire inside of the stack.

While walking through the Homeca work area where the six stacks are originally located, the inspector noted that stack fell on top of the rack as seen in Figure 22. The mortar like lining material still appears to be inside the stack when the stack was demolished. The inspector also noted that some of the bricks used in housing of the boiler are still attached to the standing structures. Insulation material appears to be comingled with the

debris (see figure 23). Figure 23 also shows what appears to be construction vehicle tracks which would further break down the insulation material and spread the contamination.

Figure 23, It appears that insulation material has been comingled with the debris pile that from the demolition of the boiler housing.


Figure 24, Insulation Material on a concreate debris. The material appears to be powdery and dry.

Figure 25, Zoom out of figure 23.

Figure 26, Further shows extent of contamination of the demolition debris.

Figure 27, Debris pile that was not totally covered by vegetation. There are aluminum cladding and blocks of insulations visible in and around debris piles.

Insulation material were found in very poor conditions on and in the demolition debris (see figure 23). Insulation material are being found scattered throughout the work area (see figure 24 to 27). The 7 stacks that were demolished by Homeca have been crushed, cut and one case have been cut into numerous smaller pieces (see figure 28 to 30).

Figure 28, Stack appears to be flatten with lining material still inside.

Figure 29, Metal stack appears to be shredded with the lining still in place.

Figure 30, A piece of metal from the stack cut with the lining still in place. This was found next to an open drain hole.

Figure 31, Found another open manhole. This one was harder to see from a distance because of the overgrown vegetation. Homeca staff stated that there were about 7 manholes that were open. He stated that superfund requested that they be open. Told them they need to closed now since superfund is done with their inspection because of the potential fall hazard.

While walking through this area, the inspector found 2 manholes that were opened. Mr. Feliciano stated that there are 7 manholes that are currently opened at the time of the inspection. The two manholes that were observed by the inspector appeared to be filled with water. The water was not clear so the inspector was unable to see if debris or insulation was under the water. Because of the debris and vegetation around the manholes, it did not appear safe to have these manholes kept open. The inspector requested that all manhole be closed to reduce risk of a person falling into one of these manholes.

The inspector continued moving to the northern end of the Homeca work area (see figure 32). A large pile of metal was noted in front of the structures that was were still standing. In and around the metal pile was insulation material that was readily identifiable (see figure 33 to 35). There is no indication of any wetting of the material.

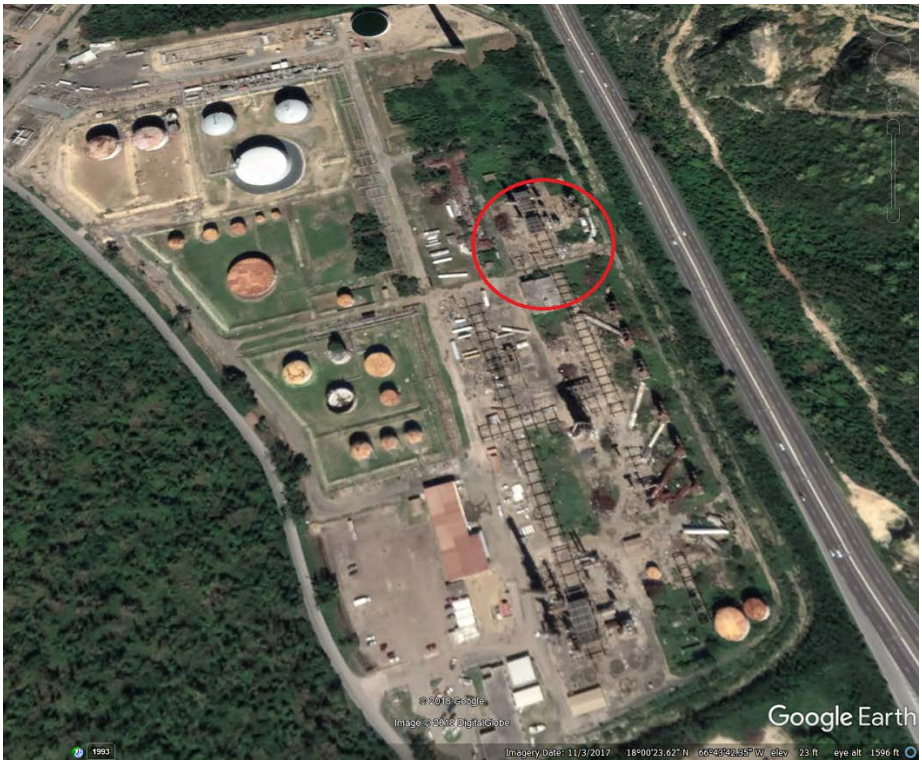

Figure 32, Northern end of the Homeca work area.

Figure 33, Metal pile that appears to have insulation material mingled in it and around it.

Figure 34, Another angle of pile in figure 33. Note the white spots in the front of the photo. These appear to be deteriorated insulation material.

Figure 35, Another angle of pile in figure 34. Insulation material was piled onto of the debris.

Pieces of insulation material was found scattered throughout the soil in this area (see figure 36). There were large standing structures located in this areas. These are structures that will be worked on in Phase two of the workplan. The inspector noted that the insulation material on these structures was in very poor condition (see figures 37-42). Insulation on the structures is openly exposed to the elements. Pipe insulation was found scattered on the ground throughout the area. (see figure 43).

Figure 36, Insulation material appears to be scattered in the soil around this area.

Figure 37, Structure with cloth lagging hanging on the top of it. Pieces of insulation material appears to have fallen around it. There was less insulation debris on the ground and concrete rack than what would be excepted if from a structure of this size.

Figure 38, Closer image of the structure in figure 37. Spots of insulation material was noted, but large accumulation of insulation not observed.

Figure 39, Image of a tank next to the structure in figure 38. The protective cladding on approximately half the structure is missing, exposing the white insulating material to the element. A portion of the insulation material have fallen off the structure.

Figure 40, Bottom of the structure in figure 39. Insulation material was found under the structure along with lagging material. In the back of the picture, we see a manhole that was open at the time of the inspection. Homeca staff stated that the Superfund asked that they keep the manhole open.

Figure 41, Bottom of another structure in this area where the lagging has deteriorated and exposed insulation material on the top.


Figure 42, Two columns at the end of the work area. There appears to be some damage to the insulation material and part of pipe attached to one of the column appears to be partially missing.

Figure 43, Under these two structures in figure 42, there was debris scattered throughout the area. Pipes were scattered throughout the area, some with insulation still attached.

Figure 44, Container, approximately 20 cubic yard. According to Homeca staff, this is their first container since they started phase I work in accordance with the EPA approved workplan.

Figure 45, Inside of the container. The container only appears to be less than half full.

Two containers were found at the site. One of the container was an enclosed container that requires to be pried open with a metal rod (see figure 44). This container contained bags that appeared to be properly labeled and secured with duct tape. The second container contained some debris which included some aluminum claddings, a piece of metal pipe, some rubber tubes, and a plastic bucket (see figure 46). Homeca stated that they were planning to line this container with 6 mil poly-sheets and use it for debris that will not be bagged.

On the way back to the decontamination station, the inspector walked past an open area where metal piles were previously stationed for recycling. At the time of the inspection, most of the metal have been removed. At this location, the inspector observed debris that resembled pipe insulation, pipe lagging, metal pipes, and other construction debris (see figure 47). A few steps away from the debris seen in figure 47, it appears that lagging and pipe insulation was ran over by construction vehicles (see figure 48).

Figure 46, Inside of the second container on site. Homeca staff stated that this container will be lined with poly and used for debris disposal.

Figure 47, In the area where the metal pile was recently removed. Note that the white material is consistent with insulation material found scattered throughout the site. There were numerous pipe insulation jackets.

Figure 48, Lagging and pipe insulation that appears to be run over by construction vehicles.

At approximately 4:10 PM, the inspector went through the decontamination station to rinse off any potential contaminants from the walkthrough. It was confirmed that hot water was available for use in the

decontamination shower. The bag that was not labeled with the proper labels (see figure 6) was replaced with properly labeled bags.

Out brief was provided to Homeca management at approximately 4:30 PM. The representative from Tallaboa was not present at the time of the out brief. During the out brief, the inspector asked to see the area air monitoring setup around perimeter of the site. Homeca stated that the monitors have been brought back to the trailer and that the air monitoring representative had left for the day. The inspector left the facility at approximately 5 PM.

Attachment
(1) Photo log

Lead Inspector's Name: Victor Tu

9/20/2018

X Victor Tu

Lead Inspector
Signed by: VICTOR TU

Assisting Inspector's Name: N/A

X

Assisting Inspector

Supervisor's Name: Harish Patel

9/20/2018

X Harish Patel

Supervisor
Signed by: HARISH PATEL

Attachment I

Tallaboa Industrial Park, Homeca Work Area EPA Inspection (07/17/2018) Photo Log	
File Name	Description
Camera, Canon T2i	
IMG_1512.JPG	Picture of active neighboring business.
IMG_1513.JPG	Picture of active neighboring business. Empire Gas De Puerto Rico tanker.
IMG_1514.JPG	From outside the site, Picture of part of metal chimney still standing
IMG_1515.JPG	From outside of the site, damage to structures inside the site and what appears to be missing insulation due to the damage.
IMG_1516.JPG	From outside of the site, damage to another structure inside the site and what appears to be missing insulation due to the damage.
IMG_1517.JPG	From outside of the site, damage to another structure inside the site and what appears to be missing insulation due to the damage.
IMG_1518.JPG	From outside of the site, damage to another structure inside the site and what appears to be missing insulation due to the damage.
Camera, Canon PowerShot	
IMG_0617.JPG	G-map location on phone indicating location where IMG_1512.JPG was taken.
IMG_0618.JPG	Zoom out image of active neighboring business in IMG_1513.JPG. Empire Gas De Puerto Rico tanker.
IMG_0619.JPG	G-map location on phone indicating location where IMG_1515.JPG was taken.
IMG_0620.JPG	Parking lot and entrance to the site in question.
IMG_0621.JPG	G-map location where IMG_0622.JPG was taken.
IMG_0622.JPG	Parking lot next to the entrance to facility's entrance
IMG_0623.JPG	Passage way into the Homeca site. A berm station was setup for vehicle cleaning. Two water buffalo is setup to collect filtered water collected from the vehicle cleaning. A decontamination station was also seen in the picture. Passage has been cleaned so that they can drive trucks into the site.
IMG_0624.JPG	Accidentally taken picture of Homeca's staff.
IMG_0625.JPG	Passage way into the Homeca site. A better shot of the berm setup for vehicle cleaning. Two water buffalo is setup to collect filtered water collected from the vehicle cleaning. A decontamination station was also seen in the picture. Passage has been cleaned so that they can drive trucks into the site.
IMG_0626.JPG	Close-up of the water buffalos and 5 micro filter and pump setup.
IMG_0627.JPG	Rotameters for flow check of air monitors
IMG_0628.JPG	Inside the decontamination unit, clean space
IMG_0629.JPG	Inside the decontamination unit, an unlabeled bag was used in the contaminated space for used personal protective clothing and filter.
IMG_0630.JPG	Inside the decontamination unit, an unlabeled bag was used in the contaminated space for used personal protective clothing. Homeca's staff call out to his staff to have the bag replaced with a labeled bag
IMG_0631.JPG	Southern End of the work area. Columns and tanks that have relatively intact ACM and aluminum covers. Pipes still appears to

	have insulation on it. The abatement of the asbestos on these structures are part of phase two of the work plan.
IMG_0632.JPG	Pipes with insulation that was found outside a locked shed. Homeca staff stated that they do not have access to the shed. Homeca staff also stated that they were not aware how the pipes with insulation got there. The material was not wrapped and not wet.
IMG_0633.JPG	Close-up of pipes with insulation that was found outside a lock shed.
IMG_0634.JPG	Close-up of pipes with insulation that was found outside a lock shed and a 1.5 feet premeasured plastic stick for scale.
IMG_0635.JPG	Pipes with insulation that was found outside a lock shed. Homeca staff stated that they do not have access to the shed.
IMG_0636.JPG	Aluminum cladding that has come off of structures at the facilities. These cladding keeps the insulations in place and protects it from the elements.
IMG_0637.JPG	Pile of comingled debris. Pipe with insulation, cladding, pipe wrapping and metal were among the material that were identifiable.
IMG_0638.JPG	Close-up of pipe wrapping.
IMG_0639.JPG	Structure with fraying insulation material
IMG_0640.JPG	Insulation material which resembles insulation on the larger structures.
IMG_0641.JPG	Insulation material that appears to have been exposed to the elements.
IMG_0642.JPG	Pipes with insulation and cladding still intact.
IMG_0643.JPG	Closeup of column in IMG_0631. Image shows that a large section of insulation and cladding is missing from the structure and deterioration of the exposed insulation.
IMG_0644.JPG	Pieces of deteriorated insulations dropping from standing structures result in white circular dots on the ground. This was seen all throughout the site.
IMG_0645.JPG	Step-back photo of spots noted in IMG_0644 where pieces of deteriorated insulations dropping from standing structures result in white circular dots on the ground. This was seen all throughout the site.
IMG_0646.JPG	Tanks and pipes with insulation material that has not been removed at time of inspection.
IMG_0647.JPG	The imprint of a piece of insulation that was taken during CERCLA inspection a few days ago. The cracks in the ground is indicative of how dry the condition is at the site.
IMG_0648.JPG	Pipe insulation that appears friable and dried laying in the open.
IMG_0649.JPG	Piles of brick and rubbles from the boiler enclosure demolition. The material was dry with no indication that it has been kept wet. The picture also shows that there is a layer of mortar like lining inside the metal stack.
IMG_0650.JPG	Same piles of brick and rubbles from the boiler enclosure demolition show in IMG_0649. This image show how far the pile stretches to. This pile has not been cover by overgrowth and is a good indication of amount of debris for each boiler that was demolished. There is 7 boilers, at the site. 6 was demolished by Homeca and one was demolished prior to Homeca's arrival onto the site.

IMG_0651.JPG	Same piles of brick and rubbles from the boiler enclosure demolition show in IMG_0649. This image was taken in the other direction of IMG_0651 and shows a bricks and rubbles with a different color.
IMG_0652.JPG	Area where soil and the debris have been mixed to an extent that separation is not practicable.
IMG_0653.JPG	Closeup of the stack opening, it is noted that a thick layer of mortar like lining is present. Part of the lining appears to be damaged and fallen off.
IMG_0654.JPG	What is left of the metal structure that use to house the boiler. There are six of these structures still standing. The stack is cut in half. It appears that this liner covers the entire inside of the stack.
IMG_0655.JPG	The mouth of another stack.
IMG_0656.JPG	It appears that insulation material has been comingled with the debris pile that from the demolition of the boiler housing.
IMG_0657.JPG	Closeup of insulation material in IMG_0656.
IMG_0658.JPG	Insulation and debris, indistinguishable by the eye.
IMG_0659.JPG	Insulation, cladding, laggings and debris appears to be mingled together.
IMG_0660.JPG	Insulation, cladding, laggings and debris appears to be mingled together.
IMG_0661.JPG	Pieces of insulation laying on top of the debris.
IMG_0662.JPG	Bits of deteriorated insulation with debris material.
IMG_0663.JPG	Pieces of insulation laying on top of the debris in IMG_0660 next to a premeasured 1 ½ ft orange stick.
IMG_0664.JPG	Pieces of insulation laying on top of black debris.
IMG_0665.JPG	Aluminum cladding among debris.
IMG_0666.JPG	Layer of refractory bricks still attached to steel structure that used to house the boilers.
IMG_0667.JPG	Debris from the demolition is covered by overgrowth of plants.
IMG_0668.JPG	A piece of insulation among the concrete debris
IMG_0669.JPG	Mouth of a crushed smoke stack. This show that the liner is friable and disturbed when the stacks were demolished.
IMG_0670.JPG	Mouth of another smoke stack that was demolished. The liner appears to be approximately 1-2 inches thick.
IMG_0671.JPG	Debris pile that not totally covered by vegetation. There are aluminum cladding and blocks of insulations visible in and around the debris piles.
IMG_0672.JPG	Closeup of an insulation block noted in IMG_0671.
IMG_0673.JPG	Closeup of another insulation block noted in IMG_0671.
IMG_0674.JPG	Closeup of an insulation block noted in IMG_0671 next to a premeasured 1 ½ ft orange stick.
IMG_0675.JPG	Piles of debris (consistent with bricks still attached to metal structures)
IMG_0676.JPG	Camera was accidentally pressed while in motion.
IMG_0677.JPG	Stack appears to be flatten with lining material still inside.
IMG_0678.JPG	Closeup of Stack that appears to be flatten with lining material still inside in IMG_0677.
IMG_0679.JPG	Insulation blocks found in debris pile along with aluminum cladding.
IMG_0680.JPG	Debris swept into little piles and left in area long enough that vegetation grow is noted on the debris.
IMG_0681.JPG	Debris have been left in place long enough that vegetation growth covers the entire pile of debris.

IMG_0682.JPG	Side view of debris in IMG_0681. Can see the debris below the vegetation growth.
IMG_0683.JPG	Metal of the boiler ensure have not been completely removed at time of the inspection.
IMG_0684.JPG	Stack laying across some metal debris.
IMG_0685.JPG	Debris which resembles the lining material inside a stack.
IMG_0686.JPG	Debris under the fallen stack in IMG_0685.
IMG_0687.JPG	Debris under the fallen stack in IMG_0685. Note the flag that was place by Superfund inspector previously where a pipe with insulation was found.
IMG_0688.JPG	Metal stack appears to be shredded to with the lining still in place.
IMG_0689.JPG	A piece of metal from the stack cut with the lining still in place. This was done next to an open drain hole.
IMG_0690.JPG	Metal pile that appears to have insulation material mingled in it and around it.
IMG_0691.JPG	Same pile as seen in IMG_0690.
IMG_0692.JPG	Next to the pile of metal in IMG_0690, it appears that insulation was pound into the ground. Insulation was also scatter and cladding was flattened. It appears that a vehicle was driven in over these material.
IMG_0693.JPG	Insulation in IMG_0690 was taken next to a 1.5 ft premeasured plastic stick for scale.
IMG_0694.JPG	Insulation in IMG_0690 was taken next to a 1.5 ft premeasured plastic stick for scale.
IMG_0695.JPG	Closeup of debris in IMG_0690 shows what appears to be insulation still on a pipe and insulation material scattered on top of the debris.
IMG_0696.JPG	Another angle of the debris in IMG_0690. Note the white spots in the front of the photo. Those appears to be deteriorated insulation material.
IMG_0697.JPG	A metal structure appears to be taken down. This structure was near the debris pile in IMG_0690.
IMG_0698.JPG	Another angle of the debris in IMG_0690. Insulation material was piled onto of the debris.
IMG_0699.JPG	Insulation material appears to be scattered in the soil around the metal debris pile in IMG_0690.
IMG_0700.JPG	Structure with cloth lagging hanging on the top of it. Pieces of insulation material appears to have fallen around it. There was less insulation debris on the ground and concrete rack than what would be excepted if from a structure of this size.
IMG_0701.JPG	Closer image of the structure in IMG_0700. Spots of insulation material was noted, but large accumulation of insulation not observed.
IMG_0702.JPG	Closer image of the structure in IMG_0700. Pieces of insulation material was noted on top of the platform that holds the structure in place.
IMG_0703.JPG	Image of a tank next to the structure in IMG_0700. The protective cladding on approximately half the structure is missing, exposing the white insulating material to the element. A portion of the insulation material have fallen off the structure.
IMG_0704.JPG	Same image as IMG_0703.JPG.
IMG_0705.JPG	Bottom of the structure in IMG_0703.JPG. Insulation material was found under the structure along with lagging material. In the back of the picture, we see a manhole that was open at the time of the

	inspection. Homeca staff stated that the Superfund asked that they keep the manhole open. Need to verify with Superfund to see if this is correct.
IMG_0706.JPG	Same image as IMG_0706.JPG.
IMG_0707.JPG	Bottom of another structure where the lagging has deteriorated and expose insulation material on the top.
IMG_0708.JPG	Found another open manhole. This one was harder to see from an distance because of the overgrowing vegetation. Homeca staff stated that there were about 7 manhole that was open. He stated that superfund requested that they be open. Told them they need to close it now since superfund is done with their inspection because of the potential fall hazard.
IMG_0709.JPG	Two columns at the end of the work area. There appears to be some damage to the insulation material and part of pipe attached to one of the column appears to be partially missing.
IMG_0710.JPG	Under these two structures in image IMG_0709, there were debris scattered throughout the area. Pipes were scatter throughout the area some with insulation still attached.
IMG_0711.JPG	Below the two structures in image IMG_0709, there were pipes that still unabated.
IMG_0712.JPG	Below the two structures in image IMG_0709, most of the pipes appeared to be bare.
IMG_0713.JPG	Below the two structures in image IMG_0709, most of the pipes appeared to be bare.
IMG_0714.JPG	Below the two structures in image IMG_0709, some pipe still has insulation one it and some have damage lagging on it.
IMG_0715.JPG	Below the two structures in image IMG_0709, some pipe still has insulation one it and some have damage lagging on it.
IMG_0716.JPG	Pipes with damaged insulation.
IMG_0717.JPG	Container, approximately 20 cubic yard. Accord to Homeca staff, this is their first container since they start phase I work in accordance with the EPA approved workplan.
IMG_0718.JPG	Side view of container.
IMG_0719.JPG	Inside of the container. The container only appears to be less than half full.
IMG_0720.JPG	Inside of the second contain on site. Homeca staff stated that this container will be lined with poly and used for debris disposal.
IMG_0721.JPG	Back of the container. The container is approximately 20 cubic yards.
IMG_0722.JPG	In the area where the metal pile was recently removed. Note that the white material is consistent with insulation material found scattered throughout the site. There were numerous pipe insulation jackets.
IMG_0723.JPG	Two metal structure still left from the metal piles.
IMG_0724.JPG	Zoom-out shot of image IMG_0722.
IMG_0725.JPG	Lagging and pipe insulation that appears to be flatten and run over by vehicles.